

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

TOWN SPORTS INTERNATIONAL, LLC, *et al.*,<sup>1</sup>

Debtors.

Chapter 11

Case No. 20-12168 (CSS)

(Jointly Administered in Part; Supplemental  
Joint Administration Requested)

**Hearing Date**

**November 23, 2020 at 10:00 a.m. (ET)**

**Objection Deadline**

**November 3, 2020 at 4:00 p.m. (ET)**

**NOTICE OF MOTION**

TO: (I) THE U.S. TRUSTEE; (II) PROPOSED COUNSEL TO THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS; (III) COUNSEL TO TACIT CAPITAL, LLC; (IV) COUNSEL TO THE AD HOC LENDER GROUP; (V) THE LESSORS UNDER THE REJECTED LEASES (VIA OVERNIGHT DELIVERY); AND (VI) ALL PARTIES THAT, AS OF THE FILING OF THIS MOTION, HAVE REQUESTED NOTICE IN THESE CHAPTER 11 CASES PURSUANT TO BANKRUPTCY RULE 2002.

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the “**Debtors**”) have filed the attached *Additional Debtors’ Omnibus Motion Pursuant to Sections 105(a), 365(a), and 554(a) of the Bankruptcy Code, Authorizing the Debtors to (I) Reject Certain Unexpired Leases of Nonresidential Real Property Effective as of the Additional Debtors’ Petition Date and (II) Abandon Property in Connection Therewith* (the “**Motion**”).

**PLEASE TAKE FURTHER NOTICE** that any objections or responses to the relief requested in the Motion must be filed on or before **November 3, 2020 at 4:00 p.m. (ET)** (the “**Objection Deadline**”) with the United States Bankruptcy Court for the District of Delaware, 824 N. Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801. At the same time, copies of any responses or objections to the Motion must be served upon the proposed undersigned counsel to the Debtors so as to be received on or before the Objection Deadline.

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<sup>1</sup> The last four digits of Town Sports International, LLC’s federal tax identification number are 7365. The mailing address for Town Sports International, LLC is 399 Executive Boulevard, Elmsford, New York 10523. Due to the large number of debtors in these cases, for which the Debtors have requested joint administration, a complete list of the Debtors, the last four digits of their federal tax identification numbers, and their addresses are not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <http://dm.epiq11.com/TownSports>, or by contacting the proposed undersigned counsel for the Debtors.

**PLEASE TAKE FURTHER NOTICE THAT A HEARING TO CONSIDER THE MOTION WILL BE HELD ON NOVEMBER 23, 2020 AT 10:00 A.M. (ET) BEFORE THE HONORABLE CHRISTOPHER S. SONTCHI IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 N. MARKET STREET, 5TH FLOOR, COURTROOM NO. 6, WILMINGTON, DELAWARE 19801.**

**PLEASE TAKE FURTHER NOTICE THAT IF NO OBJECTIONS OR RESPONSES TO THE MOTION ARE TIMELY FILED AND RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED THEREIN WITHOUT FURTHER NOTICE OR A HEARING.**

Dated: Wilmington, Delaware  
October 21, 2020

YOUNG CONAWAY STARGATT & TAYLOR, LLP

/s/ Allison S. Mielke

Robert S. Brady (No. 2847)  
Sean T. Greecher (No. 4484)  
Allison S. Mielke (No. 5934)  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: (302) 571-6600  
Email: rbrady@ycst.com  
sgreecher@ycst.com  
amielke@ycst.com

and

KIRKLAND & ELLIS LLP  
Nicole L. Greenblatt, P.C. (admitted *pro hac vice*)  
Derek I. Hunter (admitted *pro hac vice*)  
601 Lexington Avenue  
New York, New York 10022  
Telephone: (212) 446-4800  
Email: nicole.greenblatt@kirkland.com  
derek.hunter@kirkland.com

KIRKLAND & ELLIS LLP  
Mark McKane, P.C. (admitted *pro hac vice*)  
555 California Street  
San Francisco, CA 94104  
Telephone: (415) 439-1400  
Email: mark.mckane@kirkland.com

KIRKLAND & ELLIS LLP

Joshua M. Altman (admitted *pro hac vice*)

300 North LaSalle Street

Chicago, Illinois 60654

Telephone: (312) 862-2000

Email: josh.altman@kirkland.com

*Proposed Counsel to the Debtors  
and Debtors in Possession*